

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:
VENTECH ENGINEERS LP et al.,

Debtors,

**RODNEY D. TOW, CHAPTER 7
TRUSTEE FOR THE ESTATES OF
VENTECH ENGINEERS
INTERNATIONAL LLC & VENTECH
ENGINEERS, LP,**

Plaintiffs,

V.

**FIVE STAR PROPERTIES
BROADWAY LLC, VELOCYS, INC.,
KREG STANLEY, KEVIN STANLEY,
BILL STANLEY, JOHNNY VIRGIN,
IAN ANDERSON & DOES 1-10,**

Defendants.

Case No. 17-33203

Jointly Administered

Adversary No. 20 - 03075

JOINT STIPULATION TO EXTEND TIME TO RESPOND TO MOTIONS

Plaintiff Rodney D. Tow, Chapter 7 Trustee for the Estates of Ventech Engineers International LLC & Ventech Engineers, LP (“Plaintiff”) and Defendants Five Star Properties Broadway LLC, Kreg Stanley, Kevin Stanley, Bill Stanley, Johnny Virgin, Ian Anderson, and Velocys, Inc. (collectively, Defendants”)¹ file this Joint Stipulation to Extend Time to Respond to Velocys, Inc.’s Motion for More Definite Statement [ECF 22] and the Five Star Properties and The Individual Defendants’ Partial Motion To Dismiss The Complaint [ECF 23] (the “Motion to

¹ Defendants Does 1-10 are not parties to this Stipulation.

Dismiss” and together with the Motion for More Definite Statement, the “Motions”) and respectfully show the Court the following:

1. The current deadlines for Plaintiff to respond to the Motions is June 23, 2020.
2. Plaintiff and Defendants have agreed to an extension for Plaintiff to respond to the Motions to on or before July 23, 2020.
3. Any Defendant may reply to Plaintiff’s response within 7 days of the Plaintiff’s response.
4. Plaintiff and Defendants do not request this extension for purposes of delay, but so that justice may be done.

PRAYER

For the reasons set forth above, Plaintiff and Defendants respectfully request the Court enter an order reflecting the Parties’ stipulation, as well as all additional relief which the Court deems appropriate.

Date: June 24, 2020

Respectfully submitted,

/s/ Charles M. Rubio
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Properties Broadway LLC, Kreg Stanley,
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Virgin, and Ian Anderson*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was electronically filed with the Court and served through the CM-ECF system to all counsel of record registered to receive a Notice of Electronic Filing for this case on the 24th day of June 2020.

By: /s/ Charles M. Rubio
Charles M. Rubio